

Appendix A to October Joint Status Report

Defendant	Production as of 9/6	Additional Production as of 10/4 ¹
AIR Communities	* ²	*75
Allied Orion	448	
Apartment Management Consultants	81	92
Avenue5	*	*
Bell Partners	17 ³	21
BH Management	264	
Bozzuto Management	370 ⁴	26,583
Brookfield	10	
Camden Property Trust	56,778	9
CH Carter-Haston	4	
ConAm	11	26
CONTI	*	
Cortland	135,709	
CWS	44	3
Dayrise	27	
ECI Management, LLC	59	38
Equity Residential	4,887	1
Essex	138	100
First Communities	15,116	9
FPI Management	11*	*
Greystar	11 ⁵	686,286
Highmark Residential	11,207	126,789
IRT	17	
Kairoi	24	
Knightvest	12	
Lantower	18	
Lincoln Property Co. (Willow Bridge)	33,027	117,933

¹ **Going forward, any new footnotes (i.e., those addressing information in the current joint status report) will be in bold.**

² A * denotes Defendants for whom discovery is stayed pending settlement negotiations or who have reached settlements in principle.

³ Bell Partners is producing its only government production, a CID response to the Washington DC AG, prior to the September 13, 2024, status conference.

⁴ By the September 13, 2024 status conference, Bozzuto will have produced nearly 20,000 documents to Plaintiffs.

⁵ By the September 13, 2024, status conference, Greystar will have produced over 127,000 documents to Plaintiffs, and intends to make an even larger production before the October 12, 2024, status conference.

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Defendant	Production as of 9/6	Additional Production as of 10/4 ¹
MAA	6 ⁶	38,237
Mission Rock	385	
Morgan Properties	229	
Pinnacle	*	*
Prometheus	11	10
RealPage	821,386	6,315
Rose Assocs	39 ⁷	14
RPM	43,662	17,061
Sares Regis	256	1
Security Properties	81,698	
Sherman	129	
Simpson	22	
Thoma Bravo	1,080	500
The Related Cos	5	110
Thrive Communities	17 ⁸	
Trammell Crow and Crow Holdings	331	
UDR	1,050	101,348
Windsor	225,530	
Winn	132	509
ZRS	149	
TOTAL:	1,434,407	1,122,070

⁶ MAA intends to make a production of over 30,000 documents as early as today (September 6, 2024), and a second sizable production next week.

⁷ Rose has produced 39 documents (1,923 pages of documents), but Plaintiffs contend Rose's productions do not comply with the ESI order and therefore refer to this production as "2" documents here. The parties are working on resolving this issue. **The parties have resolved this issue, as indicated in the chart above.**

⁸ Thrive intends to supplement its document production prior to the September 13, 2024, status conference with a sizable production.